

Damien Nicholas Tancredi, Esq. (DT 1383)
Flaster/Greenberg PC
1810 Chapel Avenue West
Cherry Hill, NJ 08002
215-587-5675
Attorneys for John W. Hargrave, Chapter 7 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

Shirley Rose Marie Keintz,

Debtor.

Case No. 17-24341-CMG

Chapter 7

NOTICE OF MOTION FOR AN ORDER AUTHORIZING TRUSTEE TO SELL DEBTOR'S PROPERTY I.) AUTHORIZING THE CHAPTER 7 TRUSTEE TO SELL 144 LOWELL AVENUE, HAMILTON, NJ FREE AND CLEAR OF CERTAIN LIENS, WITH THOSE LIENS TO ATTACH TO PROCEEDS, PURSUANT TO 11 U.S.C. §363(B) AND §363(F); AND II.) AUTHORIZING THE CHAPTER 7 TRUSTEE TO PAY, AT CLOSING, ALL OUTSTANDING MUNICIPAL CHARGES, CLOSING COSTS (INCLUDING REAL ESTATE COMMISSION) AND THE FIRST MORTGAGE ON THE PROPERTY IN FAVOR OF SPENCER SAVINGS BANK

PLEASE TAKE NOTICE that the undersigned, attorneys for John W. Hargrave Esquire, Chapter 7 Trustee for the Estate of Shirley Rose Marie Keintz, shall move before the Christine M. Gravelle, U.S.B.J. at the United States Bankruptcy Court located at 402 East State Street, Trenton, NJ 08608, Courtroom #3, on April 17, 2018, or as soon thereafter as Counsel may be heard, on Motion for an Order Authorizing Trustee to Sell Debtor's Property.

In support of this Motion, reliance shall be placed upon the supporting certification filed herewith, and upon further documentary evidence and/or testimony, together with any legal argument which may be required at the hearing.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to enter an Order authorizing the sale of the property, or if you want the Court to consider your views on the Motion, you must file with the Court a written response explaining your position by mailing it to:

Clerk of the Court
Clarkson S. Fisher US Courthouse
402 East State Street
Trenton, NJ 08608

You must also mail a copy to:

Damien Nicholas Tancredi
Flaster/Greenberg P.C.
1810 Chapel Avenue West
Cherry Hill, NJ 08002

The response must be served no later than seven (7) days prior to the hearing date set forth herein, pursuant to D.N.J. LBR 9013-1(a).

Attend the hearing scheduled to be held on April 17, 2018 at 10:00 a.m. at Courtroom # 3, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, NJ 08608.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

Oral argument is not requested and no brief is necessary, as it does not present complicated questions of fact or unique questions of law.

FLASTER/GREENBERG P.C.

/s/ Damien Nicholas Tancredi
Damien Nicholas Tancredi

Date: April 4, 2018